dependent upon a rejected base claim. Applicant believes that claim 1 is allowable over the cited prior art at least for the foregoing reasons. Therefore, claims 3, 6, 9, 12, and 15-19, which depend on claim 1, are believed to be allowable. However, Applicant stands ready to rewrite claims 3, 6, 9, 12, and 15-19 to be in independent form so that they do not depend on rejected claims.

III. Telephone Interview

Applicant thanks Examiner Dinh for all of the courtesies extended in the telephone interview held on January 31, 2005 and February 2, 2005, with Denise L. Poy. Applicant thanks the Examiner for discussing the status of the claims.

IV. 35 U.S.C. § 102(b) and 35 U.S.C. § 103(a) Rejections

Claims 1, 4, 5, 7, 8, 10, 11, 13, and 14 have been rejected under 35 U.S.C. § 102(b) as unpatentable over U.S. Patent No. 6,728,047 to Sato et al. ("Sato"). Applicant respectfully traverses this rejection, and reconsideration is respectfully requested.

Claim 1 is directed to a lens system having: an aperture stop P; a first lens group I with an overall positive refractive power comprising a first lens with a positive refractive power and a second lens with a negative refractive power; a second lens group II with an overall positive refractive power comprising a third lens with a positive refractive power; and a third lens group III with an overall positive refractive power comprising a fourth lens with a positive refractive power. Thus, each of the lens groups I, II, III has a positive refractive power.

Sato discloses a photographing lens including an aperture stop, a first lens group with an overall positive refracting power, and second and third lens groups with "low refracting powers" (Sato, col. 9, lines 19-21). Sato also discloses that the first lens group includes two lenses L1, L2 that are bonded to each other, one of which has a positive refractive power and the other has a negative refractive power (Sato, col. 3, lines 5-7). The second and third lens groups can include

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aspherical surfaces (Sato, col. 9, lines 63-64). Sato does not specify that the low refracting powers of the second and third lens groups are positive, as set forth in claim 1.

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The present invention sets forth three lens groups each having overall positive refractive powers. As stated in the present Specification, a photographing lens with three lens groups each having overall positive refractive powers provides the following advantages:

a small total lens length that is suitable for high-density imaging elements [and] a light exit angle of no more than 24°, and ... [the lens] effectively corrects various types of aberration such as spherical aberration, astigmatism, distortion, and lateral chromatic aberration (page 3, lines 20-23, of the present Specification).

The following table summarizes the refractive powers of the three lens groups in the three embodiments of Sato's photographic lens.

	Refractive Power of the	Refractive Power of the	Refractive Power of the
	First Lens Group	Second Lens Group	Third Lens Group
First Embodiment	Positive	Negative	Positive
Second Embodiment	Positive	Positive	Negative
Third Embodiment	Positive	Negative	Positive

In the first embodiment of Sato's photographing lens, which is shown in Fig. 1, the first lens group, which includes lenses L1 and L2, has a positive refractive power, the second lens group, which includes lens L3, has a negative refractive power, and the third lens group, which includes lens L4, has a positive refractive power. Thus, the third lens group of Sato's first embodiment does not have a positive refractive power, as set forth in claim 1.

In the second embodiment of Sato's photographing lens, which is shown in Fig. 3, the first lens group has a positive refractive power, the second lens group has a positive refractive power, and the third lens group has a negative refractive power. Thus, the second lens group of Sato's second embodiment does not have a positive refractive power, as set forth in claim 1.

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In the third embodiment of Sato's photographing lens, which is shown in Fig. 5, the first lens group has a positive refractive power, the second lens group has a negative refractive power, and the third lens group has a positive refractive power. Thus, the second lens group of Sato's third embodiment does not have a positive refractive power, as set forth in claim 1.

Thus, in Sato's photographing lens, one of the second and third lens groups has a negative refractive power. Sato does not disclose or suggest that both the second and third lens groups have positive refractive powers, as set forth in claim 1.

Applicant respectfully traverses the rejection because Sato does not disclose or suggest all of the elements of claim 1. Claims 4, 5, 7, 8, 10, 11, 13, and 14 depend on claim 1 and are therefore also patentable for at least the same reasons.

Thus, Applicant respectfully submits that for at least the aforementioned reasons, claims 1, 4, 5, 7, 8, 10, 11, 13, and 14 of the present invention are patentable over the prior art. Based on the foregoing, the rejections of the claims under 35 U.S.C. § 102(b) and 35 U.S.C. § 103(a) should be withdrawn, and reconsideration is respectfully requested.

CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

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Respectfully submitted,

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